

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,	)	
	)	
Petitioner/Judgment Creditor	)	
	)	
vs.	)	
	)	
AVON CAPITAL, LLC,	)	
	)	
Respondent/Judgment Debtor,	)	
	)	
ASSET SERVICING GROUP, LLC,	)	
	)	
Respondent, Garnishee,	)	Case No. 14-FJ-05-HE
	)	
SDM HOLDINGS, LLC,	)	
	)	
Respondent/Garnishee,	)	
	)	
and	)	
	)	
AVON CAPITAL, LLC, a Wyoming Limited)	)	
Liability Company,	)	
	)	
Intervenor.	)	

**MOTION FOR ORDER TO APPLY PROPERTY TOWARD SATISFACTION OF  
JUDGMENT**

Pursuant to Fed. R. Civ. P. 69 and 12 O.S. § 850, Petitioner Universitas Education, LLC (“Universitas”) hereby applies for an order directing Avon Capital, LLC (“Avon”) to apply the life insurance policies held by SDM Holdings, LLC (hereinafter the “SDM portfolio”) toward the satisfaction of the judgment Universitas obtained against Avon on August 12, 2014. In support of this motion Universitas also files a supporting Memorandum of Law and the exhibits attached thereto.

Universitas shows the Court:

1. On August 12, 2014, Universitas obtained multiple judgments totaling \$110,737,073.73, plus post-judgment interest accruing from and after August 12, 2014, and the current balance on the judgment is at least \$26.1 million;
2. Avon is jointly and severally liable for the judgments entered on August 12, 2014;
3. Pursuant to 12 O.S. § 842, a hearing on assets of judgment debtor Avon was taken on behalf of Universitas on June 8, 2021 and continued on July 20, 2021;
4. The hearing on assets revealed that Avon nominally owns a subsidiary which owns the SDM portfolio; and
5. The SDM portfolio is not exempt by law from execution.
6. Based on the face value of the policies (and their appraised value as provided by Avon) the policies' value will not satisfy Universitas' judgment.

THEREFORE, Universitas requests that the Court order Avon to deliver the SDM portfolio to Universitas' counsel for sale by judgment creditor; and to order the net proceeds of said sale to Universitas toward satisfaction of Universitas' judgment against debtor Avon.

Dated: August 2, 2021  
Alexandria, VA

/s/ Joseph L. Manson III  
Admitted *Pro Hac Vice*  
Law Offices of Joseph L. Manson III  
600 Cameron Street  
Alexandria, VA 22314  
Telephone: 202-674-1450

[jmanson@jmansonlaw.com](mailto:jmanson@jmansonlaw.com)

*Counsel for Universitas Education, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of August 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner  
Joseph H. Bocock  
Alan Rupe  
Gerald Green  
Melvin McVay  
Clayton Ketter  
Joshua Greenhaw  
Nanette Kalcik  
Jeffrey Sandberg

/s/ Joseph L. Manson III\_\_\_\_\_